

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

No. 5:21-cv-844-XR
(Lead Case)

STATE OF TEXAS' MOTION TO WITHDRAW COUNSEL

Pursuant to Local Rule AT-3, Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State Texas, Warren K. Paxton, in his official capacity as Attorney General of Texas, and the State of Texas (collectively, "State Defendants") file this Unopposed Motion to Withdraw Ethan Szumanski as counsel in this matter.

Mr. Szumanski is no longer employed by the Office of the Attorney General of Texas. State Defendants will continue to be represented by counsel listed below. This withdrawal will not delay any proceedings. This motion is unopposed.

For the reasons stated above, State Defendants respectfully request that the Court grant this motion to withdraw Ethan Szumanski as their counsel of record and remove Mr. Szumanski from all further electronic notifications regarding this case.

Date: August 1, 2024

Respectfully submitted.

KEN PAXTON
Attorney General

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

JAMES LLOYD
Deputy Attorney General for Civil
Litigation

RYAN D. WALTERS
Chief, Special Litigation Division

/s/ Ryan G. Kercher
RYAN G. KERCHER
Deputy Chief, Special Litigation Division
Tex. State Bar No. 24060998

KATHLEEN T. HUNKER
Special Counsel
Tex. State Bar No. 24118415

WILLIAM D. WASSDORF
Assistant Attorney General
Tex. State Bar No. 24103022

ZACHARY W. BERG
Special Counsel
Tex. State Bar No. 24107706

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
ryan.kercher@oag.texas.gov
kathleen.hunker@oag.texas.gov
will.wassdorf@oag.texas.gov
zachary.berg@oag.texas.gov

COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF CONFERENCE

I certify that on July 30, 2024, State Defendants' counsel conferred with all counsel by email. Plaintiff's Counsel, Dan Freeman responded that the Department of Justice is not opposed. As of the date and time of filing, no other counsel of record has responded, therefore State Defendants presume there are no oppositions.

/s/ Ryan G. Kercher
RYAN G. KERCHER

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on August 1, 2024 and that all counsel of record were served by CM/ECF.

/s/ Ryan G. Kercher
RYAN G. KERCHER